

# EXHIBIT 4

Lyngklip  
&  
Associates  
Consumer Law Center, PLC

Ian B. Lyngklip

Julie A. Petrik

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*of Counsel*  
Gary M. Victor  
Leonard M. Bennett

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24500 Northwestern Highway, Ste. 206, Southfield, MI 48075 • (248) 208-8864

February 25, 2008

David Centner  
Clark Hill PLC  
200 Ottawa Avenue  
Grand Rapids, MI 49503

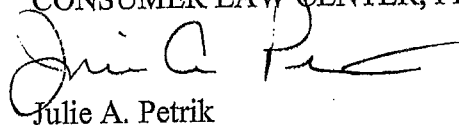
Re: **Wells v Corporate Receivables, Inc and Angela Galvin**  
**Western District of Michigan**  
**Case 1:07 cv 1214**

Counsel:

Enclosed please find our Requests for Production To Corporate Receivables, Inc and Certificate of Service. Please respond to these in the usual fashion. If you encounter any difficulties in responding or anticipate any objections, please contact my office in advance of your response so that we can resolve any difficulties informally.

Very truly yours,

LYNGKLIP & ASSOCIATES  
CONSUMER LAW CENTER, PLC



Julie A. Petrik

enclosures

cc: Rochelle Guznack (co-counsel)  
cc: Pamela Wells

UNITED STATES DISTRICT COURT  
IN THE WESTERN DISTRICT OF MICHIGAN

PAMELA WELLS  
Plaintiff,

-VS-

CORPORATE RECEIVABLES, INC.  
ANGELA GALVIN,  
Defendants.

Case No. 1:07 CV 1214  
Hon. Paul L. Maloney

**REQUESTS FOR PRODUCTION TO CORPORATE RECEIVABLES, INC**

*Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Pamela Wells requests that Corporate Receivables, Inc ("") produce within (30) days, the documents herein described. This request is intended to cover all documents in possession of Corporate Receivables, Inc., or subject to its custody and control, regardless of location.*

1. **PRODUCE:** All documents relating to Pamela Wells's alleged debt or the collection thereof.
2. **PRODUCE:** All documents involving or constituting communications between Corporate Receivables, Inc. any of its debt collectors or agents and Pamela Wells.
3. **PRODUCE:** All audio recordings of any communication by Angela Galvan or Angela Galvin with any person related to the collection of the alleged debt from Pamela Wells..

4. **PRODUCE:** All documents constituting your entire credit file, collection file and investigation file relating to any debt which sought to collect from Pamela Wells.
5. **PRODUCE:** All documents forwarded to from the originating creditor of this debt, any prior holder of this debt, or any other debt collector relating to the alleged debt.
6. **PRODUCE:** All policy manuals, procedure manuals, or other documents, which address your policies, practices or procedures for retention, dissemination or disposal of account data or collection file data, during each of the preceding five years.
7. **PRODUCE:** All documents evidencing or including data concerning the names, addresses, telephone numbers, current employers and current whereabouts of each of your employees who engaged or assisted in the collection of any debt which sought to collect from Pamela Wells.
8. **PRODUCE:** A complete audit trail of any document, computer, or other data held by you which, in any degree, address or discuss Pamela Wells.
9. **PRODUCE:** Any demand for validation from Pamela Wells relating to any debt which sought to collect from Pamela Wells.

10. **PRODUCE:** Any dispute from Pamela Wells relating to any debt which sought to collect from Pamela Wells.
11. **PRODUCE:** All documents evidencing telephone messages, recorded calls, log books or other regularly maintained records by you which contain information about communications between you and Pamela Wells .
12. **PRODUCE:** Any credit report of Pamela Wells or bearing any of Pamela Wells's personal identifiers.
13. **PRODUCE:** Any agreements under which you have maintained telephone service during the preceding year prior to the filing of the complaint relating to any telephone line which is maintained by your business or has been used by you or your agents to collect any debt.
14. **PRODUCE:** Any itemized telephone bills for service during the preceding year prior to the filing of the complaint relating to any telephone line which is maintained by your business or has been used by you or your agents to collect any debt.
15. **PRODUCE:** Any manuals for any automated dialing systems which you have used during to collect any debt within the preceding 6 years.

16. **PRODUCE:** Any policy, procedure or practice relating to the use of any autodialer system used by you within the preceding 5 years.
17. **PRODUCE:** Any programming guidelines, routines or instructions used to determine the frequency, times, or dates of calls placed by your autodialer system used by you within the preceding 5 years.
18. **PRODUCE:** Any contracts, agreements, or documents under which the debt was referred or assigned to you.
19. **PRODUCE:** The contract or account agreement on the debt at issue in the complaint.
20. **PRODUCE:** Any and all documents demonstrating how the amount claimed due was calculated, including any and all account statements and evidence of payment, including date of last payment.
21. **PRODUCE:** Any documents relating to the debt which were conveyed at the time or after the debt was referred or assigned to you.
22. **PRODUCE:** Any documents under which the portfolio in which the debt was advertised or

offered for sale.

23. **PRODUCE:** Any telephone scripts, conversation directions, decision trees, or other similar materials used to instruct your employees or agents in how to conduct collection calls with debtors.
24. **PRODUCE:** Any manuals, bulletins, memoranda or other documents establishing procedures or practices in avoiding violations of the FDCPA in the course of conducting collection calls with debtors.
25. **PRODUCE:** All material, including video and audio tapes, pertaining to training by or for Corporate Receivables, Inc. and its employees regarding the Fair Debt Collection Practices Act.
26. **PRODUCE:** All correspondence with the originating creditor of this debt relating to Pamela Wells or any debt which Corporate Receivables, Inc. sought to collect from Pamela Wells or which Corporate Receivables, Inc. reported on Pamela Wells's credit report.
27. **PRODUCE:** All operation manuals, etc., utilized by Corporate Receivables, Inc.
28. **PRODUCE:** All form letters, enclosures, envelopes, memoranda, etc. used by Corporate Receivables, Inc. in its debt collection activity relating to Pamela Wells.

29. **PRODUCE:** An organizational chart for Corporate Receivables, Inc.
30. **PRODUCE:** Copies of any complaints – whether filed in a court of law or with any regulatory agency– filed against Corporate Receivables, Inc. alleging violations of the Fair Debt Collection Practices Act.
31. **PRODUCE:** Any bulletin, manual, memoranda or other document which establishes any procedure promulgated by Corporate Receivables, Inc. to prevent the violations of the Fair Debt Collection Practices Act alleged by Pamela Wells.
32. **PRODUCE:** Any bulletin, manual, memoranda or other document which establishes compliance with any procedure promulgated by Corporate Receivables, Inc. to prevent the violations of the Fair Debt Collection Practices Act alleged by Pamela Wells.
33. **PRODUCE:** Any document providing a definitions or interpretations of any abbreviations, codes, or employee ID numbers which are contained in any of the other documents which you produce.
34. **PRODUCE:** Any insurance policies covering Corporate Receivables, Inc. for violation of the Fair Debt Collection Practices Act.



35. **PRODUCE:** All expert reports which have been prepared in connection with this lawsuit or the incident giving rise to this lawsuit, if the expert is expected to or may testify in this case.
36. **PRODUCE:** Copies of any document you intend to use to impeach the credibility of any of Plaintiff's proposed witnesses.

Respectfully Submitted,

LYNGKLIP & ASSOCIATES  
CONSUMER LAW CENTER, PLC

By: 

Julie A. Petrik (P47131)

Attorney For Pamela Wells

24500 Northwestern Highway, Ste. 206

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(248) 208-8864

JuliePetrik@Att.Net

Dated: February 25, 2008

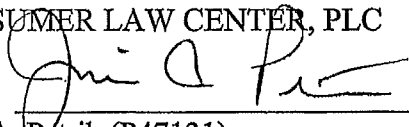
**Certificate of Service**

I hereby certify that on February 25, 2008, I served this document on the following parties:

<b>Party</b>	<b>Manner Served</b>
David Centner Clark Hill PLC 200 Ottawa Avenue Grand Rapids, MI 49503	US Mail

Respectfully Submitted,

LYNGKLIP & ASSOCIATES  
CONSUMER LAW CENTER, PLC

By:   
Julie A. Petrik (P47131)  
Attorney For Pamela Wells  
24500 Northwestern Highway, Ste. 206  
Southfield, MI 48075  
(248) 208-8864  
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Dated: February 25, 2008